

APPENDIX C: COMMENTS MADE DURING PUBLIC CONSULTATION MEETING NOVEMBER 8, 2012

The following comments were made at the Public Consultation Meeting held on November 8, 2010:

Comment #1

Amend Rule 219 (e)(8) to allow for the use of plasma arc cutters and lasers for maintenance and repair operations on molds that may contain stainless steel.

Response to Comment #1

Staff will work with the commenter and investigate whether clarifying language can be drafted.

Comment #2

Eliminate the word portable in 219 (b)(4) and increase the limit to 650,000 Btu/hr.

Response to Comment #2

Staff will work with the commenter to revisit the issue of portable versus non-portable power pressure washers.

Comment #3

Natural gas odorant systems should be explicitly identified in Rule 219 as being exempt from permit. There have been conflicting interpretations between different inspectors and engineers.

Response to Comment #3

We will discuss the suggestion internally. The concern is that natural gas odorant is a potential nuisance issue. Based on further review, staff will revise the proposal and add natural gas odorants to Rule 222.

Comment #4

Natural gas odorant systems should be explicitly identified in Rule 219 as being exempt from permit. There have been conflicting interpretations between different inspectors and engineers.

Response to Comment #4

We will discuss the suggestion internally. The concern is that natural gas odorant is a potential nuisance issue.

Comment #5

Crucible furnaces, subject to Rule 219 (e)(2), should have a provision to allow for the use of a health risk assessment to provide an exemption from permit. Change the provisions in Rule 219 (b)(2) to address “food ovens” and not “food convection ovens” and the VOC limit should be increased to 3 lbs/day which is contained in other rule sections.

Response to Comment #5

HRAs are impossible for an inspector to verify in the field, making enforcement of an HRA provision challenging, if not impossible. Staff will revisit the issue of the food convection ovens to see if changes are warranted.

Comment #6

The word “is” added to Rule 219 (i)(10) is confusing

Response to Comment #6

Our intent was for clarification. We will take another look at the wording.

APPENDIX C: COMMENTS MADE DURING PUBLIC CONSULTATION MEETING NOVEMBER 8, 2012

Comment #7

Move low emitting equipment, especially those impacted by Rule 1147 (such as automotive spray booths) into Rule 219.

Response to Comment #7

Staff is conducting a technology assessment on many types of equipment subject to Rule 1147. Staff does not support the exemption of automotive spray booths but there may be a possibility to amend Rule 1147 to address select sources.

Comment #8

Trivial activities as defined by US EPA should be explicitly exempt in Rule 219. Rule 219 should also exempt functionally identical replacement.

Response to Comment #8

Staff looked at the issue of trivial activities and concluded that Rule 219 appropriately addressed that universe. We will work with the commenter to identify specific activities and determine if further clarification is needed. Staff has deep reservations about including functionally identical replacement language in Rule 219 as it could create a huge loop-hole for significant revisions.

Comment #9

Support staff's proposal for gas turbines.

Response to Comment #9

Thank you for your input.

Comment #10

The language in section 219 (h) and 219 (l) for non-solvent based coatings is confusing.

Response to Comment #10

This is existing language and we are willing to work with the commenter to draft language.